1	GEOFFREY HANSEN		
2	Acting Federal Public Defender Northern District of California SEVERA KEITH Assistant Federal Public Defender 8th Floor - Suite 820 55 South Market Street San Jose, CA 95113 Telephone: (408) 291-7753 Facsimile: (408) 291-7399		
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7	Email: Severa_Keith@fd.org		
8	Counsel for Defendant Pech		
9	Counsel for Beleficant 1 con		
10	IN THE UNITED STATES DISTRICT COURT		
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
12			
13	SAN JOSE DIVISION		
14	LINITED CTATES OF AMEDICA	Case No. CD 21 71500 MAC (VVD)	
	UNITED STATES OF AMERICA,	Case No.: CR 21-71580-MAG (VKD)	
15	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO MODIFY CONDITIONS OF	
16	V.	RELEASE RE: TRAVEL TO EASTERN DISTRICT OF CALIFORNIA	
17	BRIAN PECH,	TO BE FILED UNDER SEAL	
18	Defendant.		
19			
20	IT IS HEREBY STIPULATED AND AGREED between the government through its attorney,		
21	Stephen Meyer, and defendant Brian Pech through his attorney, Severa Keith, that the Condition of		
22	Pretrial Release and Appearance requiring Mr. Pech to remain in the Northern District of California		
23	be modified, such that Pretrial Services may permit Mr. Pech to travel from his home to Sacramento,		
24	California, for the purpose of visiting his mother. Mr. Pech will travel to Sacramento no earlier than		
25	that 8:00 a.m on Sunday, October 24, 2021, and he will return to his home no later than 9:00 p.m., on		
26	the same day.		
27	Mr. Pech is compliant with his conditions of pretrial release. Pretrial Services has no objection		
28	to this proposed modification, and undersigned c	to this proposed modification, and undersigned counsel has provided the address in Sacramento to the	
	STIPULATION AND [PROPOSED] ORDER TO MODIFY CONDITIONS OF RELEASE RE: TRAVEL TO EASTERN DISTRICT OF CALIFORNIA PECH, CR 21-71580-MAG (VKD) [UNDER SEAL]		

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1	Pretrial Services Officer.		
2	18 U.S.C section 42(c)(3) states, "[t]he judicial officer may at any time amend the order to		
3	impose additional or different conditions of release." 18 U.S.C § 31452(c)(3).		
4	As such, the parties request that the Court exercise its authority to modify the Conditions of		
5	Release and Appearance, as stipulated.		
6	IT IS SO STIPULATED.		
7			
8	Dated: October 22, 2021		
9		GEOFFREY HANSEN	
10		Acting Federal Public Defender Northern District of California	
11		/S/	
12		SEVERA KEITH Assistant Federal Public Defender	
13			
14	Dated: October 22, 2021		
15		STEPHANIE HINDS	
16		Acting United States Attorney Northern District of California	
17		/S/	
18		STEPHEN MEYER Assistant United States Attorney	
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STIPULATION AND [PROPOSED] ORDER TO MODIFY CONDITIONS OF RELEASE RE: TRAVEL TO EASTERN DISTRICT OF CALIFORNIA PECH, CR 21-71580-MAG (VKD) [UNDER SEAL]

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FILED

Oct 22 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN PECH,

Defendant.

Case No.: CR 21-71580-MAG (VKD)

[PROPOSED] ORDER TO MODIFY CONDITIONS OF RELEASE RE: TRAVEL TO EASTERN DISTRICT OF CALIFORNIA

[PROPOSED] ORDER

GOOD CAUSE HAVING BEEN SHOWN, the Court Orders, for the reasons set forth in the parties' Stipulation, that the Condition of Pretrial Release and Appearance requiring Mr. Pech to remain in the Northern District of California be modified, such that Pretrial Services may permit Mr. Pech to travel from his home to Sacramento, California, for the purpose of visiting his mother, on October 24, 2021, beginning travel no earlier than 8:00 a.m. and returning to his home on the same day, no later than 9:00 p.m.

All other conditions of pretrial release shall remain in effect.

[Proposed] order to modify conditions of release Re: travel to eastern district of california ${\it CR~21-71580-MAG~(VKD)} 2$